

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE GEISINGER SYSTEM
SERVICES AND EVANGELICAL
COMMUNITY HOSPITAL
HEALTHCARE WORKERS
ANTITRUST LITIGATION

No. 4:21-cv-00196

Chief Judge Matthew W. Brann

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule 5.8, Plaintiffs, by and through their undersigned counsel, hereby move for leave to file under seal the following documents:

1. Plaintiffs' Memorandum of Law in Support of Motion for Class Certification;
2. Plaintiffs' Memorandum of Law in Support of Motion to Exclude an Opinion and Related Analyses of Dr. Laurence Baker; and
3. The Declaration of Adam J. Zapala and Exhibits thereto.

A redacted copy of these documents has been filed by ECF and an unredacted copy of these documents has been filed by mail to the Clerk of the Court concurrently

with this Motion, pending sealing decision by the Court. Along with this Motion, Plaintiffs submit a Statement of Justification in Support and a proposed Order.

WHEREFORE, Plaintiffs respectfully request that the Court file under seal an unredacted copy of the above-referenced documents.

Date: June 14, 2024

/s/ Adam J. Zapala

Adam J. Zapala (*Pro Hac Vice*)
Elizabeth T. Castillo (*Pro Hac Vice*)
James G. Dallal (*Pro Hac Vice*)
COTCHETT, PITRE &
McCARTHY, LLP
840 Malcolm Road
Burlingame, CA 94010
Phone: (650) 697-6000
Fax: (650) 697-0577
azapala@cpmlegal.com
ecastillo@cpmlegal.com
jdallal@cpmlegal.com

Alexander E. Barnett (*Pro Hac Vice*)
COTCHETT, PITRE &
McCARTHY, LLP
40 Worth Street, Suite 602
New York, NY 10013
Phone: (212) 201-6820
abarnett@cpmlegal.com

Respectfully submitted,

/s/ Eric J. Cramer

Eric L. Cramer (PA Bar No. 69289)
(*Pro Hac Vice*)
Shanon Jude Carson (PA Bar No.
85957)

Candice J. Enders (PA Bar No. 92107)
(*Pro Hac Vice*)
Michael J. Kane (PA Bar No. 73998)
(*Pro Hac Vice*)

Michaela L. Wallin (*Pro Hac Vice*)
J. Taylor Hollinger (PA Bar No.
332706) (*Pro Hac Vice*)

BERGER MONTAGUE PC
1818 Market Street, Suite 3600

Philadelphia, PA 19103
Phone: (215) 875-4604
Fax: (215) 875-5707
ecramer@bm.net
scarson@bm.net
cenders@bm.net
mkane@bm.net
mwallin@bm.net
thollinger@bm.net

Daniel J. Walker (*Pro Hac Vice*)
BERGER MONTAGUE PC

1001 G Street, NW
Suite 400 East

Washington, DC 20001
Phone: (202) 559-9745
dwalker@bm.net

Interim Co-Lead Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF CONCURRENCE

I, Adam J. Zapala, hereby certify that concurrence was sought from counsel for Defendants Geisinger System Services and Evangelical Community Hospital in this Motion for Leave to File Under Seal. As of 4:00pm EDT on June 14, 2024, counsel for Defendants have not responded to this inquiry.

Date: June 14, 2024

/s/ Adam J. Zapala

Adam J. Zapala

CERTIFICATE OF SERVICE

I, Adam J. Zapala, hereby certify that a true and correct copy of the foregoing Motion for Leave to File Under Seal was served upon all counsel of record via electronic mail on this 14th day of June, 2024.

Date: June 14, 2024

/s/ Adam J. Zapala

Adam J. Zapala